Shiloh S. Hernandez (MT Bar No. 9970) Western Environmental Law Center 103 Reeder's Alley Helena, MT 59601

Phone (SH): (406) 204-4861

E-mail: hernandez@westernlaw.org

Kyle J. Tisdel (CO Bar No. 42098) (admitted pro hac vice)

Western Environmental Law Center 208 Paseo del Pueblo Sur, #602

Taos, New Mexico 87571 Phone: (575) 613-8050

E-mail: tisdel@westernlaw.org

Elizabeth B. Forsyth (CA Bar No. 288311) (admitted pro hac vice)

Earthjustice

800 Wilshire Blvd., Suite 1000

Los Angeles, CA 90017 Phone: (415) 217-2000

E-mail: eforsyth@earthjustice.org

Counsel for Plaintiffs

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MONTANA GREAT FALLS DIVISION

WILDEARTH GUARDIANS, et al.,

Plaintiffs,

VS.

BUREAU OF LAND MANAGEMENT, et al.,

Defendants.

CV-18-73-GF-BMM

JOINT MOTION TO EXTEND STAY OF PROCEEDINGS RELATED TO PLAINTIFFS' MOTION FOR FEES UNDER THE EQUAL ACCESS TO JUSTICE ACT Plaintiffs Wilderness Workshop, *et al.* and Federal Defendants U.S. Bureau of Land Management, *et al.* ("Defendants") hereby respectfully file this joint motion to extend the stay of proceedings related to Plaintiffs motion for attorneys' fees, costs, and other expenses under the Equal Access to Justice Act. (*See* Doc. 45.)

The Court granted the Parties' first joint motion to stay proceedings on fees and costs on September 21, 2020. (Doc. 48.)

Counsel for the Parties remain engaged in good faith settlement negotiations on the issue of fees and costs, and have reached an agreement in principle.

Accordingly, the Parties request an additional continuance and stay to finalize this agreement. The Parties jointly request that the Court extend the stay of proceedings for 30 days, or until December 17, 2020. If the Parties are unable to reach a final settlement, on December 17, 2020, they will so inform the Court and either request an additional continuance and stay if good faith settlement negotiations continue, or propose a briefing schedule for an amended motion, response, and reply.

Respectfully submitted this 16th day of November, 2020.

/s/ Shiloh Hernandez
Shiloh Hernandez
Western Environmental Law Center
103 Reeder's Alley
Helena, Montana 59601
(406) 204-4861
hernandez@westernlaw.org

Attorney for Plaintiffs

/s/ Paul Turcke
Paul A. Turcke, Trial Attorney
Natural Resources Section
Environment and Natural Resources
Division
United States Department of Justice
202-353-1389 (desk)
202-532-5994 (mobile)
paul.turcke@usdoj.gov

Attorney for Defendants